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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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MAR 29 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Telephone Number Portability) CC Docket No. 95-116
) DA 96-358

FURTHER COMMENTS OF AMERITECH

Ameritech¹ files its Further Comments in this matter pursuant to the Commission's Public Notice released on March 14, 1996. The Commission asks parties to address how the passage of the Telecommunications Act of 1996 ("the Act") affects the issues raised in the Commission's Notice of Proposed Rulemaking issued in this matter in July of 1995 ("Number Portability NPRM"). Since the Act only addresses service provider number portability, it has no direct impact on either location or service number portability. For that reason, although Ameritech continues to support the development of these other forms of number portability, it will limit its Further Comments to service provider number portability.²

Ameritech will show that the Commission's Number Portability NPRM addresses all the requirements of the Act, and that the Commission's tentative conclusions in the Number Portability NPRM are generally

¹ Ameritech means: Illinois Bell Telephone Company, Indiana Bell Telephone, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Incorporated.

² As used in these Further Comments, the term "number portability" means long term service provider number portability, and the term "interim number portability" means interim service provider number portability.

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consistent with the Act. In fact, the Act resolves many of the questions raised by the Commission. For these reasons, with the exception of cost recovery Ameritech believes that the Commission can prescribe its requirements for implementation of long term number portability under the Act based upon the record already developed in this proceeding, as supplemented by this round of further comments. As Ameritech recommended in its earlier Reply Comments,³ the Commission should address cost recovery for long term number portability through an expedited, focused Joint Board charged with developing national principles for recovery of long term number portability costs on a competitively neutral basis.⁴

The Commission can expeditiously and efficiently prescribe long term number portability on a national basis if it builds upon what has already been adopted by the industry in a number of states. Therefore, in the balance of its Further Comments, Ameritech will describe the current status of its development and deployment of interim and long term number portability. Ameritech will show that the Act resolves the requirements for the provision of interim number portability, and that Ameritech is already

³ Section 251(e)(2) resolves the issue of the basis for recovery of the cost of establishing long term number portability under Section 251(b) and provides that they shall be "borne by all telecommunications carriers on a competitively neutral basis as determined by the Commission". (emphasis added)

⁴ Ameritech Reply Comments pp. 4-7.

providing interim number portability in two states that fully comply with those requirements. There is nothing further the Commission needs to do in this proceeding on the issue of interim number portability.

Ameritech will further demonstrate that a long term number portability architecture has been adopted by an industry workshop in Illinois and is scheduled for initial deployment in the portions of Illinois where new LECs are in operation by the second quarter of 1997. The same architecture has also been adopted in other states. Ameritech is prepared to promptly implement the same architecture in other areas, as soon as an industry consensus is achieved. Ameritech will show that this long term number portability architecture fully complies with the Act.

1. The Number Portability NPRM addresses the number portability issues raised in the Act.

Sections 251(b)(2) and 251(d)(1) of the Act require that the Commission prescribe the "requirements" for long-term number portability. The Commission's tentative conclusion that long term number portability should be expeditiously developed and deployed meets this statutory requirement.⁵ Therefore, Ameritech recommends that the Commission issue its long term number portability requirements based upon the record in this matter, as supplemented by this round of further comments. By proceeding in this

⁵ See, Number Portability NPRM ¶ 29-34.

manner, the Commission will facilitate the expeditious development and deployment of number portability.

As discussed earlier, the only open issue is cost recovery for long term service provider number portability which Ameritech believes warrants a Joint Board that includes state regulators and the industry. Ameritech recommends that the Commission charge the Joint Board with the sole task of promptly developing national principles for the recovery of the costs of long term number portability on a competitively neutral basis from all telecommunications carriers as required by the Act.⁶

2. The Act resolves several of the issues addressed in the Number Portability NPRM.

The Act resolves several of the questions raised by the Commission in the Number Portability NPRM. Under the Act:

1. All LECs, including BOCs, independent incumbent LECs, and new LECs, have a duty to provide long term number portability.⁷ The only exception applies to rural LECs that have

⁶Section 251(e)(2).

⁷ The Act establishes the duty to provide "number portability" in Section 251(b)(2) which applies to "all local exchange carriers". (emphasis supplied)

obtained an exemption from the applicable state commission pursuant to Section 251(f)(2) of the Act.

2. The Commission must prescribe the requirements for long term number portability. [Section 251(b)(3) of the Act]. As discussed elsewhere in these Further Comments, the Commission can expedite deployment and help prevent waste and inefficiency if it prescribes the architecture for long term number portability that has already been adopted in several states, including Illinois, Maryland, California and Georgia.⁸
3. As discussed earlier, the costs of establishing long term number portability must be borne by “all telecommunications carriers on a competitively neutral basis as determined by the Commission.” [Section 251(e)(2) of the Act]
4. BOCs seeking to provide in-region interLATA service must deploy “interim number portability through remote call forwarding, direct inward dialing trunks, or other comparable arrangements” until they have established long term number portability pursuant to the Commission’s regulations.⁹ The Act therefore resolves the debate regarding the appropriateness of using

⁸ Other states that are considering this architecture include Colorado, Florida, Indiana, Michigan, New York, Ohio, and Wisconsin. Canada is in the process of adopting the same architecture.

⁹ Section 271(c)(2)(b)(xi) specifies that “[u]ntil the date by which the Commission issues regulations. . . to require number portability, [BOCs shall provide] interim number portability through remote call forwarding, direct inward dialing trunks, or other comparable arrangements, with as little impairment of functioning, quality, reliability, and convenience as possible.”

remote call forwarding or DID trunks to provide interim number portability, or the need for additional mid-term arrangements.¹⁰

3. Interim number portability utilizing remote call forwarding and DID trunks is already available and the Commission need not take any further action on this issue in this Proceeding.

Since the Act has already effectively resolved all issues concerning interim number portability by requiring that BOCs that wish to enter the in-region when LATA business provide interim number portability through remote call forwarding or direct in-ward dialing trunks, there is no reason for the Commission to go further. Ameritech already offers interim number portability service using remote call forwarding and direct inward dialing trunks under state tariffs in Illinois and Michigan. Ameritech is also preparing to file to provide the same interim number portability services in Indiana, Ohio and Wisconsin plans to begin to provide those services during the third quarter of 1996.

As discussed, remote call forwarding and DID trunks are prescribed as interim number portability services by Section 271(c)(2)(B)(xi) of the Act. Both services provide viable and convenient forms of number

¹⁰ An example of a "mid-term" arrangement is the so-called Carrier Portability Code ("CPC") plan. Although initially proposed as a potential long term architecture, it has recently been proposed as a mid-term alternative by a few parties. However, there is no requirement under the Act that BOCs deploy any interim arrangement beyond remote call forwarding or direct inward dialing trunks, nor is there any reason to do so since long term number portability can be available within a little over a year. See, section 4 following.

portability until long term number portability is deployed by the industry. In addition, Ameritech is offering its interim number portability service under tariffs authorized by state commissions. As such, cost recovery for interim number portability is already being addressed at the state level. The Commission need not to duplicate those efforts in this proceeding.¹¹

4. Several states have adopted a long term number portability architecture that fully meets the requirements of the Act and is scheduled to be initially deployed in 1997.

Since Ameritech filed its Reply Comments in this proceeding in October of 1995, an industry workshop in Illinois conducted under the aegis of the Illinois Commerce Commission ("ICC") has completed development of a long term number portability architecture. The Illinois workshop includes a cross section of the industry -- LECs, new LECs, interexchange carriers and cellular carriers.¹² The long term number portability architecture selected by

¹¹ Section 251(e)(2) specifies that number portability costs are to be recovered on a "competitively neutral basis" as determined by the Commission. But the term "number portability" as defined in the Act refers to long term number portability that is to say "without impairment of quality, reliability, or convenience". [Section 153 (33)] However, the "interim number portability" which is required by the interLATA checklist in Section 271(c)(2)(B)(xi) of the Act utilizes remote call forwarding or direct inward dialing trunks and which the Act requires cause as "little impairment of functioning, quality, reliability, and convenience as possible." Unless the Commission finds that remote call forwarding and direct inward dialing trunks provide long term number portability under Section 251(b)(2), it should find that the Act does not require it to address rate making for those services.

¹² The industry workshop participants include Ameritech, AT&T, GTE, Cellular One, MCI Metro, MFS, Sprint/Centel, Teleport, and the ICC Staff.

the Illinois workshop is Location Routing Number ("LRN") administered by a neutral third party. LRN utilizes a unique routing address to forward calls to ported numbers to the proper terminating office. Other states that have completed a comprehensive analysis of long term number portability have also determined that LRN best meets their criteria for selection of a long term number portability architecture.¹³

The Illinois industry workshop has signed a stipulation and agreement to deploy the LRN service, which was approved by the ICC on March 13, 1996. The Illinois workshop further obtained commitments from switch manufactures to deliver LRN software during the second quarter of 1997. The workshop has also issued a Request for Proposal for the neutral third-party administrator. LRN number portability service is scheduled to begin to be deployed in the portions of the Chicago LATA where new LECs are in operation during the second quarter of 1997. A copy of the stipulation and ICC order approving LRN is attached as Attachment A.

The policy criteria for selection of LRN by the Illinois workshop were:

1. National compatibility.
2. Expandable to accommodate location and service number portability.
3. Causes no change in how end users originate or terminate calls.
4. All participating providers can deploy the same architecture.

¹³ *Supra*, section 2.

5. Does not require routing of traffic through the incumbent LEC networks.
6. Accommodates access to number portability data bases at multiple locations within networks.
7. Administration is performed by a neutral third party.
8. Causes no network degradation of service or loss of functionality.
9. Consistency with existing network infrastructure and standards.
10. Conserves numbers and codes.
11. Not proprietary to any single manufacturer.
12. Supports 911/E911.

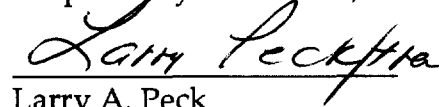
LRN fully meets the above architecture and thereby also meets each of the requirements for long term number portability of the Act.¹⁴ As such, LRN is an ideal number portability template for all jurisdictions. At a minimum, whatever requirements the Commission prescribes it should allow enough flexibility so the industry and the states can implement LRN without delay.

¹⁴ The Act defines the term “number portability” as the “ability of users of telecommunications services to retain, at the same location existing telecommunications numbers without impairment of quality, reliability or convenience when switching from one telecommunications carrier to another.” The above criteria addresses each of these requirements, and adds several additional ones.

6. Conclusion

The Commission should issue its requirements for number portability based upon the record in this proceeding, as supplemented by this round of further comments. The Commission should prescribe the LRN architecture as the template for long term number portability, or should at least permit enough flexibility so the industry can deploy LRN without delay. The Commission should address competitively neutral cost recovery of long term service provider number portability costs in a Joint Board.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Larry A. Peck".

Larry A. Peck

Frank Panek

Attorney for Ameritech

Room 4H86

2000 W. Ameritech Center Drive

Hoffman Estates, IL. 60196-1025

847-248-6074

March 29, 1996



ILLINOIS COMMERCE COMMISSION

March 15, 1996

Re: 96-0089

Dear Sir/Madam:

Enclosed is a certified copy of the Order entered by this Commission.

Sincerely,

A handwritten signature in cursive script that reads "Donna M. Caton".

Donna M. Caton
Chief Clerk

Enc.

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Illinois Bell Telephone Company; :
GTE North Incorporated; GTE :
South Incorporated; Central :
Telephone Company of Illinois; :
AT&T Communications of Illinois, :
Inc.; MCI Telecommunications :
Corporation; MCIMetro Transmission: :
Services, Inc.; Sprint Communi- : 96-0089
cations Company L.P.; MFS Intele- :
net of Illinois, Inc. Teleport :
Communications Group, Inc. :
:
Joint petition for approval of :
Stipulation and Agreement relating: :
to the implementation of Local :
Number Portability. :

ORDER

By the Commission:

On February 20, 1996, Illinois Bell Telephone Company; GTE North, Incorporated; GTE South, Incorporated; Central Telephone Company of Illinois; AT&T Communications of Illinois, Inc.; MCI Telecommunications Corporation; Sprint Communications Company L.P.; MCI Metro Transmission Services, Inc.; MFS Intelenet of Illinois, Inc.; and Teleport Communications Group, Inc. on behalf of its affiliates TC Systems-Illinois TCG Illinois and TCG Chicago, filed with the Commission a Stipulation and Agreement (Appendix "A" attached hereto and made part hereof) executed by those parties and a Joint Petition seeking the Commission's adoption of the terms of the Stipulation and Agreement. The Stipulation and Agreement calls for the adoption of the call processing model for local number portability recommended for use in their serving areas in Market Service Area 1 ("MSA-1") in Illinois by a consensus of the signatories as a result of participation in the Industry Working Group, or task force, established by an order of the Commission in Dockets 94-0096, 94-0117, 94-0146 and 94-0301, Consolidated, entered April 7, 1995 ("CFP Order"). The Stipulation and Agreement also calls for the adoption of certain other issues agreed to by the signatories.

Pursuant to notice given in accordance with the rules and regulations of the Commission, this matter came on for hearing before a duly authorized Hearing Examiner of the Commission at its offices in Chicago, Illinois, on March 1, 1996. Appearances were entered by counsel for Illinois Bell Telephone Company; Central Telephone Company of Illinois; Sprint Communications Company L.P.;

MFS Intelenet of Illinois, Inc.; Teleport Communications Group, Inc.; Southwestern Bell Mobile Systems, Inc. d/b/a Cellular One-Chicago; MCI Telecommunications Corporation; MCIMetro Transmission Corporation, Inc.; GTE North, Incorporated; GTE South, Incorporated; AT&T Communications of Illinois, Inc.; and staff of the Commission. Terry D. Appenzeller, Vice President of Ameritech's, Open Market Strategy Division testified as a joint witness in support of the Stipulation and Agreement. At the conclusion of the hearing, this matter was marked "Heard and Taken."

The Stipulation and Agreement provides that the Location Routing Number (LRN) model should be adopted as the long-term call processing model for implementation of local number portability in the serving areas of those parties identified as "Designated Parties" in MSA-1 in Illinois. Mr. Appenzeller testified that the LRN model was selected by a consensus of the signatories as a result of participation in the industry task force established by the Commission to develop a permanent number portability solution in Illinois. Mr. Appenzeller further testified that the consensus was reached after a thorough review and analysis by the task force participants. Mr. Appenzeller testified that the switch vendor does not commit to new switch development unless it has a firm order to do so. The switch vendors have expressed a willingness to commit resources without a firm order if the Commission approves a call model for use consistent with the Stipulation and Agreement.

Mr. Appenzeller stated that the Stipulation and Agreement further provides that initially only wireline service provider portability will be provided in the serving areas of the parties identified as "Designated Parties" in MSA-1. He testified that it was the consensus of the task force that initially limiting local number portability to service provider portability will meet the most immediate need of new entrants, to be able to obtain customers while permitting customers to retain those telephone numbers either at the same location or in the same immediate geographical area. Mr. Appenzeller testified that there are three types of local number portability: service provider portability, location portability and service portability. Mr. Appenzeller maintained that service provider portability provides the ability for customers to switch service providers, or carriers, at the same location or within limited geographic area, for example, a rate center and retain their telephone numbers. Mr. Appenzeller stated that location portability permits a person to change locations over a larger geographic area, possibly even to another state, while retaining one's original telephone number. He also noted that geographic portability allows a customer to change services (for example, from POTS to ISDN) while retaining the same telephone number assigned to his/her analog telephone service.

Mr. Appenzeller testified that because of the differences in the design of cellular providers' networks, initially local number portability will only be provided by wireline telecommunications carriers. A person will not be able to port a telephone number from one cellular provider to another cellular provider, or from a cellular provider to a wireline provider or vice versa. However, calls from cellular telephones to ported wireline telephone numbers will be completed. Calls from ported wireline telephone numbers will also be completed to cellular telephones.

The Stipulation and Agreement also provides that, initially, billing for calls to ported numbers will not have to be changed. Customer prefixes, or NXXs, would continue to be associated with the existing rate centers of incumbent LECs. Mr. Appenzeller testified this will lessen customer and carrier impacts. Carriers will be able to bill a person calling a number that has been ported as if the number had not been ported.

Staff stated it had no objection to entry of an Order approving the Stipulation and Agreement. No other party objected to entry of an Order approving the same.

The Commission concludes that the instant Stipulation and Agreement which provides for adoption of the LRN model as the long-term call processing model for the implementation of local number portability in areas of MSA-1 is reasonable and should be approved. This agreement is the result of a detailed analysis and review by an industry wide task force which the Commission established to develop a permanent number portability solution in Illinois. This Stipulation and Agreement represents a step closer to developing a reasonable number portability solution in Illinois. For these reasons, we conclude that the Stipulation and Agreement should be approved.

The Commission, having considered the entire record, and being fully advised in the premises, is of the opinion and finds that:

- (1) Illinois Bell Telephone Company; GTE North Incorporated; GTE South Incorporated; Central Telephone Company of Illinois; AT&T Communications of Illinois, Inc.; MCI Telecommunications Corporation; MCIMetro Transmission Services, Inc.; Sprint Communications Company L.P.; MFS Intelenet of Illinois, Inc. Teleport Communications Group, Inc. are corporations engaged in the practice of maintaining a public telephone system in the State of Illinois and as such are telecommunications carriers within the meaning of the Public Utilities Act;
- (2) the Commission has jurisdiction over the parties hereto and the subject matter thereof;

- (3) that the recitals of facts and conclusions reached in the prefatory portion of this Order are supported by record, and are hereby adopted as findings of fact herein;
- (4) that the Location Routing Number call model is reasonable and supported by the record for use as the long-term call processing model for implementation of local number portability in the serving areas in MSA-1 of the parties identified in the Stipulation and Agreement as "Designated Parties";
- (5) that all carriers identified in the Stipulation and Agreement as "Designated Parties" should provide wireline service provider portability within their serving areas in MSA-1;
- (6) that all parties identified in signing the Stipulation and Agreement as "Designated Parties" should provide location portability, on a short-run basis, within incumbent LEC rate centers in MSA-1;
- (7) that, in order to allow billing to continue unchanged for calls terminated to ported numbers, NXXs should, in the short run, continue to be associated with the existing rate centers of incumbent LECs;
- (8) that the Joint Petition should be granted and the Stipulation and Agreement should be approved.

IT IS THEREFORE ORDERED by the Illinois Commerce Commission that the Joint Petition is hereby granted and the Stipulation and Agreement is hereby approved.

IT IS FURTHER ORDERED that Local Routing Number shall be the call model for the provision of local number portability in the serving areas of the parties identified in the Stipulation and Agreement as "Designated Parties" in MSA-1.

IT IS FURTHER ORDERED that the parties identified in the Stipulation and Agreement as "Designated Parties" shall provide service provider portability.

IT IS FURTHER ORDERED that the parties identified in the Stipulation and Agreement as "Designated Parties" shall provide locations portability in their serving areas in MSA-1 within the incumbent LECs' existing rate centers.

IT IS FURTHER ORDERED that NXXs shall continue to be associated with the incumbents' existing rate centers.

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IT IS FURTHER ORDERED that subject to the provisions of Section 10-113 of the Public Utilities Act and 83 Ill. Adm. Code 200.880, this Order is final; it is not subject to the Administrative Review Law.

By Order of the Commission this 13th day of March, 1996.

(SIGNED) DAN MILLER

Chairman

(S E A L)

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Petition of Illinois Bell Telephone :
Company; GTE North Incorporated; :
GTE South Incorporated; Central :
Telephone Company of Illinois; :
AT&T Communications of Illinois, :
Inc.; MCI Telecommunications :
Corp; MCIMetro Transmission :
Services, Inc.; MFS Interenet :
of Illinois, Inc.; Teleport :
Communications Group, Inc. and :
Southwestern Bell Mobile Systems, :
Inc. d/b/a Cellular One -- Chicago; :
Sprint communications L. P. :
Approval of a Stipulation and :
Agreement to Implement Local :
Number Portability in Market :
Service Area 1. :

STIPULATION AND AGREEMENT

The Parties hereto, and anyone that subsequently expresses concurrence on the record, recommend and request that the following findings and conclusions be adopted by the Illinois Commerce Commission to assist in implementing local number portability ("LNP") in Market Service Area 1 ("MSA-1").

1. The Commission in its Order in Dockets 94-0096, 94-0117, 94-0146 and 94-0301 (Consolidated) adopted "Staff's proposal

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to create an industry task force to develop a permanent number portability solution for Illinois." Order at 110.

2. The Parties hereto have participated in extensive workshops held by the industry task force to develop a permanent number portability solution.

3. Ameritech Illinois; AT&T Communications of Illinois, Inc.; Central Telephone Company of Illinois ("Centel"); MCIMetro Transmission Services, Inc.; MCI Telecommunications Corp.; MFS Intelnet of Illinois, Inc.; Sprint Communications Company L.P.; and Teleport Communications Group, Inc. on behalf of its affiliates, TC Systems-Illinois, Inc., TCG Chicago, and TCG Illinois (the "Designated Parties") enter this Stipulation and Agreement for the purpose of implementing LNP in the areas where they provide telecommunications service in MSA-1.

4. The Parties agree that, initially, only wireline service provider portability will be provided. Initially, it will be provided only in the geographic area comprising the territories served by Ameritech-Illinois and Centel in MSA-1.

5. The Parties agree that, initially, wireline customer prefixes or wireline NXXs should continue to be associated with

existing rate centers of the incumbent local exchange providers ("LECs").

6. The Designated Parties agree that the Location Routing Number ("LRN") call model should be adopted as the long-term call processing model for implementation of LNP in their serving areas in MSA-1. The Parties have participated in the drafting of the switch development requirements attached hereto as Exhibit A, entitled Generic Switching and Signaling Requirements for Number Portability (FSD 30-12-0001, Issue 1). The Designated Parties agree to install in their respective switches in MSA-1 the software developed in accordance with Exhibit A, and any amendments as mutually agreed to by the Parties.

7. The Parties enter into this Stipulation and Agreement based on their expectations that LNP based on LRN will be generally available for implementation by the second quarter of 1997. The Designated Parties agree to begin implementing LNP based on LRN when software is available which meets, in all material respects, the requirements of Exhibit A.

8. Nothing in this Stipulation and Agreement prohibits a party from petitioning the Illinois Commerce Commission for an

alternative LNP solution is, subsequent to the signing of this Stipulation and Agreement, it appears that LNP based on LRN that meets the requirements of Exhibit A will not be generally available by the second quarter of 1997 or cannot be readily implemented soon thereafter.

9. The Parties agree to permit other telecommunications carriers to voluntarily provide LNP based on LRN in MSA-1 consistent with provisions of this Stipulation and Agreement.

10. The parties agree that this stipulation and Agreement shall remain in full force and effect until superseded by a Commission rule or order.

11. The Parties agree to address cost recovery issues in a separate Commission proceeding.

12. The terms of this Stipulation and Agreement have resulted from extensive discussions among the Parties. It is not intended to represent the position of any Party or the affiliate of any Party on any individual issue, but rather it should be interpreted as a composite position of the Parties. This Stipulation and Agreement is presented to the Illinois Commerce Commission for adoption in its entirety. If not adopted in its

entirety, this Stipulation and Agreement shall be void, and no party shall be bound by any of the agreements or provisions hereof.

13. Nothing in this Stipulation and Agreement restricts a Party from petitioning the Commission for a waiver of the terms and conditions of this Stipulation and Agreement.

ILLINOIS BELL TELEPHONE COMPANY

By: _____

Its: _____

GTE NORTH INCORPORATED

By: _____

Its: _____

GTE SOUTH INCORPORATED

By: _____

Its: _____

CENTRAL TELEPHONE COMPANY OF ILLINOIS

By: _____

Its: _____

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entirety, this Stipulation and Agreement shall be void, and no party shall be bound by any of the agreements or provisions hereof.

13. Nothing in this Stipulation and Agreement restricts a Party from petitioning the Commission for a waiver of the terms and conditions of this Stipulation and Agreement.

ILLINOIS BELL TELEPHONE COMPANY

By: _____

Its: _____

GTE NORTH INCORPORATED

By: David E. Hefner

Its: Attorney

GTE SOUTH INCORPORATED

By: David E. Hefner

Its: Attorney

CENTRAL TELEPHONE COMPANY OF ILLINOIS

By: _____

Its: _____

entirety, this Stipulation and Agreement shall be void, and no party shall be bound by any of the agreements or provisions hereof.

13. Nothing in this Stipulation and Agreement restricts a Party from petitioning the Commission for a waiver of the terms and conditions of this Stipulation and Agreement.

ILLINOIS BELL TELEPHONE COMPANY

By: _____
Its: _____

GTE NORTH INCORPORATED

By: _____
Its: _____

GTE SOUTH INCORPORATED

By: _____
Its: _____

CENTRAL TELEPHONE COMPANY OF ILLINOIS

By: ME
Its: Attorney

AT&T COMMUNICATIONS OF ILLINOIS, INC.

By: William A. Smith

Its: Attorney

MCI TELECOMMUNICATIONS CORPORATION

By: _____

Its: _____

SPRINT COMMUNICATIONS COMPANY L.P.

By: _____

Its: _____

MCIMETRO TRANSMISSION SERVICES, INC.

By: _____

Its: _____

MFS INTELENET OF ILLINOIS, INC.

By: _____

Its: _____

AT&T COMMUNICATIONS OF ILLINOIS, INC.

By: _____

Its: _____

MCI TELECOMMUNICATIONS CORPORATION

By: Jean Davidson

Its: James Connor

SPRINT COMMUNICATIONS COMPANY L.P.

By: _____

Its: _____

MCIMETRO TRANSMISSION SERVICES, INC.

By: Jean Davidson

Its: James Connor

MFS INTELNET OF ILLINOIS, INC.

By: _____

Its: _____